

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(B)

WALSH PIZZI O'REILLY FALANGA LLP

Three Gateway Center

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Proposed Counsel for Randi S. Ellis, Legal

Representative for Future Talc Claimants,

In Re:

LTL Management LLC,

Debtor.

Case No.: 23-12825

Judge: Michael B. Kaplan

Chapter: 11

**APPLICATION FOR RETENTION OF PROFESSIONAL**

1. The applicant, Randi S. Ellis, Legal Representative for Future Talc Claimants, is the (check all that apply):

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☐ Debtor: ☐ Chap. 11 ☐ Chap. 13

☐ Official Committee of \_\_\_\_\_

2. The applicant seeks to retain the following professional Walsh Pizzi O'Reilly Falanga LLP to serve as (check all that apply):

☒ Attorney for\*: ☐ Trustee ☐ Debtor-in-Possession

\* Randi S. Ellis, Legal Representative for Future Talc Claimants

☐ Official Committee of \_\_\_\_\_

Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of \_\_\_\_\_

☐ Other Professional:

☐ Realtor ☐ Appraiser ☐ Special Counsel

☐ Auctioneer ☐ Other (specify): \_\_\_\_\_

3. The employment of the professional is necessary because:

I require legal representation in connection with my role as Legal Representative for Future Talc Claimants.

4. The professional has been selected because:

Walsh Pizzi O'Reilly Falanga LLP ("Walsh"), founded by Liza M. Walsh, is a majority woman owned firm, and has extensive experience in the pharmaceutical space, class actions and product liability, including significant experience handling mass tort and MDL litigation. Mark Falk, a former Chief Magistrate Judge for the District of New Jersey, has extensive experience with mass tort cases both as a lawyer and former judge. Walsh also has substantial experience in bankruptcy representations headed by Stephen Falanga. Walsh served as my counsel in the Debtor's previous bankruptcy case – Case Number 21-30589 ("LTL I")

5. The professional services to be rendered are as follows:

All legal services that will enable me to fully discharge my obligations and responsibilities as Legal Representative for Future Talc Claimants in the bankruptcy case.

6. The proposed arrangement for compensation is as follows:

The terms of employment of Walsh, subject to the approval of the Court, are that certain attorneys and other personnel within the firm will undertake this representation at their standard hourly rate, plus disbursements.

Hon. Mark Falk (Ret.): \$960.00

Liza M. Walsh: \$905.00

Stephen V. Falanga: \$695.00

Partners: \$420.00 - \$850.00

Associates: \$330.00 - \$410.00

Paralegals: \$210.00

These hourly rates are subject to periodic adjustments to reflect economic and other conditions, and with respect to those below the level of senior partner, to reflect their increased experience and expertise.

7. To the best of the applicant's knowledge, the professional's connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: I hereby incorporate Paragraph 6 of the Certification of Mark Falk.

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

☐ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☒ Other; explain: See description set forth in Paragraph 6 of the Certification of Mark Falk

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: \_\_\_\_\_

\_\_\_\_\_

The applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may determine and allow.

Date: May 18, 2023

s/ Randi S. Ellis

Signature of Applicant